

1 The Honorable Barbara J. Rothstein
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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10 TELEBUYER, LLC,

11 Plaintiff,

12 v.

13 AMAZON.COM, INC., AMAZON WEB
SERVICES LLC, and VADATA, INC.,

14 Defendants.

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16 AMAZON.COM, INC., AMAZON WEB
SERVICES LLC, and VADATA, INC.,

17 Counterclaimants,

18 v.

19 TELEBUYER, LLC,

20 Counterclaim-
Defendant.

21 Case No. 2:13-cv-01677-BJR

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24 [REDACTED] AMAZON'S
OBJECTIONS TO TELEBUYER'S
PROPOSED TECHNICAL ADVISOR
CANDIDATE

1 On the November 5, 2014 teleconference with the Court, both parties agreed that the
2 most important requirement for a Technical Advisor here is real technical expertise concerning
3 the core Internet and telephone communications technologies underlying this action. Telebuy-
4 er's proposed Advisor, REDACTED, does not satisfy this requirement.

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[REDACTED] AMAZON'S OBJECTIONS TO
TELEBUYER'S PROPOSED
TECHNICAL ADVISOR CANDIDATE

Case No. 2:13-cv-01677-BJR

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12 3. REDACTED James Kurose is a
13 true expert, and has been so for the entire relevant period. Professor Kurose is a Distinguished
14 Professor of Computer Science at the University of Massachusetts, and has been actively re-
15 searching, developing, and teaching the core technologies involved in this action for over thirty
16 years. (D.I. 177 at p. 5) In addition to his work as a professor, Dr. Kurose has worked as a visit-
17 ing scientist in IBM's Communications Department from 1990 to 1991, and for Thom-
18 son/Technicolor in 2006 and 2012. (*Id.*) He is an IEEE Fellow, and has received numerous ac-
19 colades and awards for his work as a computer scientist. (D.I. 177 at pp. 5-8.) Most importantly,
20 Professor Kurose's work has remained focused on the Internet and other computer and telephone
21 networks, communications, and related technological issues. (D.I. 177 at pp. 5-31.) And, to the
22

23 2^{REDACTED}
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1 extent important to Telebuyer, Professor Kurose has been employed twice as an expert in patent
2 litigation, once by a plaintiff and the second time by a defendant.

3 For these reasons, Amazon respectfully asks the Court to appoint Professor Kurose ^{REDACTED}

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1 November 7, 2014

Respectfully submitted,

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22 Counsel for Defendants

23 AMAZON.COM, INC., AMAZON WEB
24 SERVICES LLC, and VADATA, INC.

CERTIFICATE OF SERVICE

I, Richard G. Frenkel, hereby certify that on November 7, 2014, I caused the foregoing [REDACTED] **AMAZON'S OBJECTIONS TO TELEBUYER'S PROPOSED TECHNICAL ADVISOR CANDIDATE** to be served on the following parties as indicated below:

<p>Jeremy E. Roller Diana S. Breaux YARMUTH WILSDON PLLC 818 Stewart Street, Suite 1400 Seattle, WA 98101</p> <p><i>Attorneys for Plaintiff Telebuyer LLC</i></p>	<p>[] By United States Mail [] By Legal Messenger <input checked="" type="checkbox"/> By Electronic CM/ECF [] By Overnight Express Mail [] By Facsimile [] By Email [by agreement of counsel] jroller@yarmuth.com dbreaux@yarmuth.com</p>
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November 7, 2014

By: *s/ Richard G. Frenkel*

Richard G. Frenkel

LATHAM & WATKINS LLP

[REDACTED] AMAZON'S OBJECTIONS TO
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